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To Floyd Nichols/EPR/R8/USEPA/US@EPA
cc "Jenkins, Michael" <Michael.Jenkins@pacifiCorp.com>

bcc

Subject 3rd West Sub Control House Work Plan

Floyd,

I received your voice mail this morning. The file I have attached is the scope of work for our contract with Thermal West, the company we are hiring to clean up the control house. If this is not complete enough for a work plan, please let me know what additional items must be added.

I spoke with our attorney, Mike Jenkins, this morning about you, Matt Cohn, Mike, Steven Thiroiot(?), and me meeting in Salt Lake as soon as possible. As expected, the ones with the difficult schedules are the attorneys. Mike will be contacting Matt today to try to find a date prior to 3/11. I will contact Mr. Thiroiot and speak with him about the meeting. Prior to the meeting, I would like to distribute to the attendees a list of topics to be covered. To that end, please send me the list of items you and Mr. Cohn want to ensure are discussed.

We seem to be getting close to being able to start on the control house clean-up. Apparently, one of the main issues still to resolve prior to beginning is the consent order, which, I believe, is currently in Mr. Cohn's hands.

I look forward to meeting you and Mr. Cohn in person in Salt Lake.
<<Thermal West SOW R2.doc>>

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Exhibit A

Scope of Work

I. Introduction

- A. This Scope of Work describes Contractor's responsibilities in the clean-up and disposal of asbestos-containing dust from the control house at Company's 3rd West Substation, located at 333 West 100 South, Salt Lake City, Utah

II. General Requirements

- A. Company shall ensure one of its employees trained in electrical hazards associated with energized substations is on site as a safety watch at all times that Contractor's employees are inside the substation fence.
 - 1. Contractor's employees shall obey the safety watch on all issues concerning electrical safety.
- B. Contractor shall take appropriate steps to safeguard existing items which are scheduled to remain in the facility. These items may include flooring, electrical panels, equipment such as burglar and fire alarms, sensors, speakers, clocks, mechanical grilles, furnaces, light fixtures, conduits, etc.
- C. Contractor shall install and maintain at Contractor's expense a job telephone. Telephone shall be located inside the control house and shall be operational prior to commencement of clean-up activities. Contractor shall be fully responsible for all charges to this telephone.
- D. Contractor shall provide sufficient chemical toilets on the job site for Contractor's personnel, the Industrial Hygiene Consultant and any authorized visitors. Contractor shall ensure these toilets are maintained appropriately and in a hygienic manner.
- E. Contractor shall provide all water necessary for completion of work described in this Scope of Work.
- F. Contractor shall supply all equipment necessary to produce and use controlled low pressure compressed air for cleaning surfaces of energized electrical equipment.
- G. Contractor shall provide an English-speaking interpreter on-site any time Contractor personnel are non-English-speaking.

III. Laws and Regulations

- A. Contractor shall determine the extent of city, county, AQMD, state, federal and all other applicable laws and regulations.

- B. Contractor shall perform the work in compliance with the most stringent regulations in effect for the work site.

IV. Notifications and Fees

- A. Contractor shall properly complete and submit all notifications required for performing the work and pay all required fees.

V. Training and Certifications

- A. In the performance of the work covered by this Scope of Work, Contractor shall employ only workers possessing current certification indicating successful completion of asbestos worker or asbestos supervisor training as described in 40 CFR 763.
- B. Contractor shall employ only workers who have received training in Hazard Communication in accordance with 29 CFR 1910.1200.
- C. Contractor shall employ only workers who have received training in Respiratory Protection in accordance with 29 CFR 1910.134.
- D. Contractor shall, prior to commencement of work, produce, and have available on site for all Contractor-employed workers, training certifications, training records and respirator fit test records.
 - 1. Contractor shall keep these certifications and records available on demand at the work site for the duration of this project.

VI. Personal Protective Equipment (PPE)

- A. Contractor shall provide PPE for all its workers, consisting of Tyvek, or equivalent, over-suits, booties, and hoods; gloves impervious to asbestos fibers; hard hats; safety glasses; steel-toed shoes; and dual P-100 filter half-mask air-purifying respirators (or better).
- B. PPE, as described in IV.A., above, shall be worn by Contractor's workers at all times while inside the control house, until work described in this Scope of Work is complete.
- C. Contractor shall establish a clean area immediately outside the control house for donning PPE.
- D. Contractor shall establish an appropriately protected area immediately outside the control house for doffing PPE.
 - 1. This area shall be established such that contamination from inside the control house and/or contamination from PPE is not transferred to unprotected areas outside the control house.

VII. Clean -up

- A. Contractor shall establish negative pressure ventilation with HEPA (high efficiency particulate air) filtration in the building.
- B. Contractor shall remove all settled dust and associated debris from both the upstairs and downstairs portions of the control house building using compressed air, vacuuming and/or wet wiping for all surfaces.
- C. Contractor shall wet-clean all surfaces other than those containing or immediately adjacent to electrical equipment.
 - 1. Contractor acknowledges that the control house contains electric panels and other energized electrical equipment and components which pose potential hazards and agrees to use controlled low pressure compressed air to clean debris and dust from these surfaces.
 - 2. Contractor shall exercise all due care and caution to avoid electrical hazards during his work.
- D. All material, components, equipment, supplies, and shelving in the basement shall be HEPA vacuumed and/or wet-wiped to clean all dust and debris from exterior surfaces.
 - 1. This cleaned material shall then be removed from the control house and placed in or on Company-provided trucks or trailers.
 - 2. Company representatives shall be on site to determine proper disposition of cleaned material removed from the control house basement.
 - 3. Only concrete and conduit (permanently-installed items) shall remain in the control house basement at the conclusion of Contractor's work.
- E. Removed asbestos-containing material (dust and debris) shall be cleaned up and bagged on a continual basis.
 - 1. Removed material shall be containerized, appropriately labeled and secured at the end of each work day.
 - 2. Contractor shall use a waste container that can be made secure from unauthorized disposal, so no extraneous waste is included with the waste generated by Contractor.

VIII. Personnel Monitoring

- A. Contractor shall conduct asbestos personnel breathing-zone air monitoring each day of the work.
 - 1. Contractor shall post (in writing) all personnel air sampling results at the job site no later than the end of the following work day.

IX. Transport and Disposal of Waste

- A. Contractor shall transport all waste in leak-tight containers, in poly-lined, enclosed vehicles.
 - 1. Contractor shall ensure vehicles transporting waste are be appropriately marked.
 - 2. Contractor shall ensure vehicles transporting waste carry all required shipping papers and that these shipping papers are completely and appropriately filled out.
- B. Contractor shall transport all waste generated during the performance of work described in this scope of work to a landfill permitted to accept the type of waste generated.
 - 1. Contractor shall complete all paperwork and pay all fees associated with the disposal of this waste.

X. Completion of Work

- A. Clean-up work shall be considered complete when both the upstairs and basement areas successfully pass aggressive air monitoring clearance tests following the clean-up activities described in VII Clean-up, above.
 - 1. Aggressive air monitoring clearance tests shall be performed in accordance with 40 CFR 763 Appendix A.
 - 2. The upstairs area and the basement area of the control house shall be considered separate airspaces.
 - 3. Five (5) individual air samples shall be taken from each separate air space.
 - 4. Areas shall be considered clean when the average of the five (5) aggressive air samples taken from the corresponding airspace is no greater than 70 structures per mm².
- B. The work covered by this Scope of Work shall be considered complete when air monitoring described in X. Completion of Work A., above, has been successfully completed; all materials, tools, and equipment brought on site by Contractor have been removed from the site; and all waste generated in the performance of this work has been removed from the site.